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13 UNITED STATES DISTRICT COURT
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA
15 WESTERN DIVISION

16 AMERICAN CIVIL LIBERTIES
17 UNION FOUNDATION OF
SOUTHERN CALIFORNIA,

18 Plaintiff,

19 v.

20 UNITED STATES IMMIGRATION
21 AND CUSTOMS ENFORCEMENT,
UNITED STATES DEPARTMENT OF
22 HOMELAND SECURITY; UNITED
STATES DEPARTMENT OF
23 HOMELAND SECURITY, OIG

24 Defendants.

No. 2:22-cv-04760-SB-AFM

**NOTICE OF FILING U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT DECLARATION
CONCERNING AGENCY
WORKLOAD AND RESOURCES IN
SUPPORT OF DEFENDANTS'
PROPOSED PROCESSING RATE AS
SET FORTH IN THE JOINT RULE
26(f) REPORT (ECF 28)**

Honorable Stanley Blumenfeld, Jr.
United States District Judge

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

Defendants U.S. Immigration and Customs Enforcement, U.S. Department of Homeland Security, and U.S. Department of Homeland Security OIG hereby submit the following Declaration of Fernando Pineiro, FOIA Director of the U.S. Immigration and Customs Enforcement Freedom of Information Act Office, attached hereto as Exhibit 1, in support of their position in the Joint Rule 26(f) Report regarding the agency's resources and ability to process documents responsive to Plaintiff's FOIA request.

Dated: November 29, 2022

Respectfully submitted,

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